

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,
et al.,**

**Plaintiffs and
Counterclaim Defendants,**

v.

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., et al.,**

**Defendants and
Counterclaim Plaintiffs.**

Case No. 4:16-cv-02163

DECLARATION OF JARED GOODMAN

Pursuant to 28 U.S.C. § 1746, I, Jared Goodman, declare the following to be true and correct to the best of my knowledge and belief:

1. I am counsel for Defendant and Counterclaim Plaintiff Angela Scott. I make this declaration based upon my personal knowledge.

2. Ms. Scott resides in Gaithersburg, Maryland. She has informed me that it is difficult for her to travel to St. Louis, Missouri, because she has a fear of flying.

3. My co-counsel Martina Bernstein and I made several attempts to obtain the consent of Counterclaim Defendant Connie Braun Casey (“Casey”) to conduct Ms. Scott’s deposition via videoconference. Most recently, on January 18, 2019, at 1 p.m., attorney Bernstein and I conferred by telephone with Casey’s counsel Victor Essen.

4. During this conference, Mr. Essen rejected our proposal to allow Ms. Scott to testify via videoconference, giving as the sole reason the fact that Scott is “prosecuting” her counterclaims in Missouri. Later that day, Mr. Essen served a Notice of Deposition, requiring

Ms. Scott to appear in St. Louis on February 8. A true and correct copy of the Notice of Deposition is attached hereto as **Exhibit A**.

5. In order to testify at the noticed deposition in person, Ms. Scott would have to travel approximately 1,600 miles round trip in freezing winter weather and potentially dangerous driving conditions and be absent from work and home for several days and nights.

I declare under the penalty of perjury that the foregoing is true and correct.

January 19, 2019

Los Angeles, CA

/s/ Jared Goodman
Jared Goodman